

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

DR. FREDERICK K. C. PRICE, an individual,

Plaintiff,

v.

JOHN STOSSEL, an individual, GLENN RUPPEL, an individual, AMERICAN BROADCASTING COMPANIES, INC., a Delaware corporation, ABC INC., a Delaware corporation, OLE ANTHONY, an individual, TRINITY FOUNDATION, INC., an entity, form unknown,

Defendants.

**07-CV-11364 (SWK)**

CONSENT MOTION TO ADMIT  
WILLIAM E. PALLARES  
*PRO HAC VICE*

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Joanne J. Romero, a member of good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

Applicant Name:	William Edward Pallares
Firm Name:	Lewis Brisbois Bisgaard & Smith LLP
Address:	221 North Figueroa Street, 12 <sup>th</sup> Floor
City/State Zip:	Los Angeles, CA 90012
Telephone No.:	(213) 250-1800
Fax No.:	(213) 250-7900

William E. Pallares is a member in good standing of the Bar of the State of California. There are

no pending disciplinary proceedings against William E. Pallares in any State or Federal Court.

I have contacted counsel of record for all parties who consent to this Motion.

DATED: February 26, 2008  
New York, New York

By:

  
Joanne J. Romero (JR 0275)

Lewis Brisbois Bisgaard & Smith LLP

199 Water Street, Suite 2500

New York, NY 10038

Tel: (212) 232-1300

Fax: (212) 232-1399

*Attorneys for Defendants Ole Anthony and  
The Trinity Foundation, Inc.*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DR. FREDERICK K. C. PRICE, an individual,

Plaintiff,

v.

JOHN STOSSEL, an individual, GLENN RUPPEL, an individual, AMERICAN BROADCASTING COMPANIES, INC., a Delaware corporation, ABC INC., a Delaware corporation, OLE ANTHONY, an individual, TRINITY FOUNDATION, INC., an entity, form unknown,

Defendants.

State of New York )  
                          )  
                          ss.  
County of New York    )

07-CV-11364 (SWK)

AFFIDAVIT OF JOANNE J. ROMERO  
IN SUPPORT OF CONSENT MOTION  
TO ADMIT WILLIAM E. PALLARES  
*PRO HAC VICE*

Joanne J. Romero, being duly sworn, hereby deposes and says as follows:

1. I, Joanne J. Romero, am an associate of the law firm of Lewis Brisbois Bisgaard & Smith, LLP, counsel for Defendants Ole Anthony and the Trinity Foundation, Inc. (collectively "Defendants") in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set for herein and in support of Defendants' motion to admit William E. Pallares as counsel *pro hac vice* to represent Defendants in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice on May 23, 2001. I am also admitted to the bar of the United States District Court for the Southern District of New York since September 21, 2004, and am in good standing with this Court.
3. I have known William E. Pallares since 2008. Attached hereto as Exhibit A is a Certificate of Good Standing issued by the California State Bar.

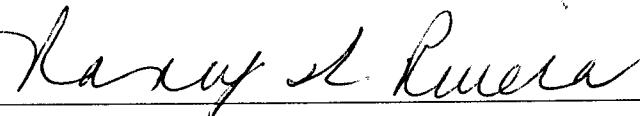
4. Mr. Pallares is an Associate at Lewis Brisbois Bisgaard & Smith LLP, in Los Angeles, California.
5. I have found Mr. Pallares to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of William E. Pallares, *pro hac vice*.
7. I respectfully submit a proposed order granting the admission of William E. Pallares, *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit William E. Pallares, *pro hac vice*, to represent Defendants in the above captioned matter, be granted.

DATED: February 26, 2008  
New York, New York

By:   
(R 0275)

Sworn to before me on this 26<sup>th</sup> day of February, 2008



**Nancy I. Rivera**  
Notary Public, State of New York  
No. 01RI6058556  
Qualified in New York County  
Commission Expires 5/14/20 11

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DR. FREDERICK K. C. PRICE, an individual,

Plaintiff,

v.

JOHN STOSSEL, an individual, GLENN RUPPEL, an individual, AMERICAN BROADCASTING COMPANIES, INC., a Delaware corporation, ABC INC., a Delaware corporation, OLE ANTHONY, an individual, TRINITY FOUNDATION, INC., an entity, form unknown,

Defendants.

07-CV-11364 (SWK)

ORDER FOR ADMISSION OF  
WILLIAM E. PALLARES *PRO HAC  
VICE* ON WRITTEN MOTION

Upon the motion of Joanne J. Romero, attorney for Defendants Ole Anthony and Trinity Foundation, Inc., and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Applicant Name:	William Edward Pallares
Firm Name:	Lewis Brisbois Bisgaard & Smith LLP
Address:	221 North Figueroa Street, 12 <sup>th</sup> Floor
City/State Zip:	Los Angeles, CA 90012
Telephone No.:	(213) 250-1800
Fax No.:	(213) 250-7900

is admitted to practice *pro hac vice* as counsel for Defendants Ole Anthony and Trinity Foundation, Inc., in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of

this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password and nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

DATED: \_\_\_\_\_, 2008  
New York, New York

By: \_\_\_\_\_  
Judge Shirley W. Kram



**THE STATE BAR  
OF CALIFORNIA**

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

**MEMBER SERVICES CENTER**

TELEPHONE: 888-800-3400

February 20, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, WILLIAM EDWARD PALLARES, #187740 was admitted to the practice of law in this state by the Supreme Court of California on March 27, 1997; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

  
Kath Lambert  
Custodian of Membership Records

File No. 24799-165 Dr. Frederick k.C. Price v. John Stossel, et al., United States District Court, Southern District of New York Case No. 07 CV 11364 (SWK)

**AFFIDAVIT OF SERVICE BY OVERNIGHT MAIL (FEDERAL EXPRESS)**

**STATE OF NEW YORK )**  
                          ) ss:  
**COUNTY OF NEW YORK)**

Nancy Rivera, being duly sworn, deposes and says:

I am not a party to this action, am over 18 years of age and I reside in the State of New York, County of New York.

That on the 26<sup>th</sup> day of February, 2008, I served a true copy of the annexed **CONSENT MOTION TO ADMIT WILLIAM EDWARD PALLARES PRO HAC VICE** upon the following:

**Matthew Lore Levine, Esq.**  
Fish & Richardson P.C.  
153 East 53<sup>rd</sup> Street  
New York, New York 10022  
(212) 765-5070  
*Attorneys for Plaintiff*

**Alexander Rufus-Isaacs, Esq.**  
Richelle L. Kemker, Esq.  
Glassman, Browning, Saltsman & Jacobs,  
Inc.  
360 North Bedford Drive, Suite 204  
Beverly Hills, CA 90210  
(310) 278-5100  
*Attorneys for Plaintiff*

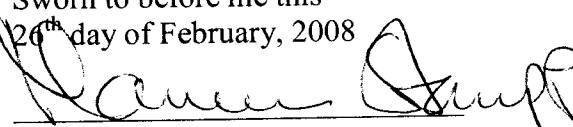
**Andrew M. White, Esq.**  
Alison Roher, Esq.  
White O'Connor Curry LLP  
10100 Santa Monica Blvd., Suite 2300  
Los Angeles, CA 90067  
(310) 712-6100  
*Attorneys for Defendant – John Stossel*

**Indira Suh Satyendra, Esq.**  
ABC Inc.  
77 West 66<sup>th</sup> Street  
New York, New York 10023  
(212) 456-7832  
*Attorneys for Defendant – ABC Inc.*

by depositing same enclosed in a federal express envelope and dropped off at a Federal Express location within the State of New York.

  
\_\_\_\_\_  
Nancy Rivera

Sworn to before me this  
26<sup>th</sup> day of February, 2008

  
\_\_\_\_\_  
Notary Public

4849-4702-3874.1

MAUREEN STAMPP  
NOTARY PUBLIC, State of New York  
No. 02ST5014512  
Qualified in Queens County  
Commission Expires July 15, 2011